

# State of Tennessee, County of Shelby

CIVIL WARRANT NO.

1712130

## To Any Lawful Officer to Execute and Return:

Summon to appear before the Court of General Sessions of Shelby County, Tennessee, Room 106  
Shelby County Courthouse, 140 Adams Ave., Memphis, Tennessee

Defendant	Versant Supply Chain	Defendant	AT + T	Defendant	
Address	4105 S. Mendenhall	Address	Memphis, TN 38115	Address	

on DAY Monday DATE 12-1 2014 TIME 10:4m A.M. / P.M.

to answer in a civil action brought by the Plaintiff (s) Dorothy Dunbar 245 W. Person  
Memphis, TN 38109  
for Discrimination for my Religion And disability. I was  
Allowed to work for them for 8-9 months. Once I became  
disable, they told me I could not wear my skirts on the job.  
Under \$40,000.00 Dollars

Issued this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

EDWARD L. STANTON, JR., General Sessions Court Clerk

By \_\_\_\_\_  
Deputy Clerk

Atty. For Plff. Dorothy Dunbar  
Address 245 W. Person Memphis, TN 38109  
Phone 901-503-4761  
Code No. \_\_\_\_\_  
B.P.R. No. \_\_\_\_\_

## JUDGMENT

Judgment for \_\_\_\_\_  
\_\_\_\_\_ and Cost  
of suit and litigation taxes, for which Execution may issue.

This \_\_\_\_\_ day \_\_\_\_\_ 20\_\_\_\_

Judge of Division \_\_\_\_\_

## SERVICE

Came to hand same day issued and executed as  
commanded on \_\_\_\_\_

Versant Supply Chain  
Serity Patricia Lewis

Came to hand same day issued and executed as  
commanded on \_\_\_\_\_

This 16 day of OCT 2014

This \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

Sheriff/Process Server

Sheriff/Process Server

Aldridge 905 \*\*\*SEE OTHER SIDE FOR ADDITIONAL SERVICE\*\*\*  
\*\*\*AND NOTICE TO DEFENDANT(S)\*\*\*

EXHIBIT A



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**  
**Memphis District Office**

1407 Union Avenue, Suite 901

Memphis, TN 38104

Intake Information Group: (800) 669-4000

Intake Information Group TTY: (800) 669-6820

Memphis Status Line: (866) 408-8075

Memphis Direct Dial: (901) 544-0119

TTY (901) 544-0112

FAX (901) 544-0111

Website: [www.eeoc.gov](http://www.eeoc.gov)

Ms. Dorothy Dunbar  
245 W. Person Avenue  
Memphis, TN 38109

Re: Dorothy Dunbar vs. Versant Supply Chain & AT & T  
Charge Numbers: 490-2013-01483, 490-2013-02213

Dear Ms. Dubar:

This letter is to advise you that no further action will be taken by the Commission on your case. You alleged during your initial interview with Versant, you advised them that you did not wear pants due to your religious belief. You were assigned to work at AT & T and from August 2012 through April 2013 you were provided an accommodation by being allowed to wear a jean skirt. On or about April 24, 2013 you advised management of your disabilities. This very day you were discharged and you believe that it was because of your religion and disabilities. Both Respondents deny your allegations.

The evidence revealed you were hired by Versant on August 15, 2012 and was assigned as a picker with AT & T around August 31, 2012. Your duties as a picker required you to work on the Tape and Dunnage line where you packaged boxes on a powered conveyor and taped them for shipping. Due to the nature of the facility, loose fitting clothing like skirts and dresses create a safety hazard and were not permitted due to the dress code for AT & T. It is undisputed that you were accommodated and allowed to wear a jean skirt due to your religious belief for a period of time; however during a quarterly safety inspection in April it was brought to the attention of the General Manager, Andy Allen that the dress code should be followed by all employees including temps. You were offered to continue to remain employed as long as you adhered to Respondent's dress code policy but once you refused, your assignment was ended. Evidence revealed that A T & T could not accommodate your religious beliefs without imposing an undue hardship due to the direct threat that allowing you to wear a skirt could cause for you and/or others. As a result, there was no evidence uncovered to support that you were discriminated against because of your religion (Apostolic).

Evidence revealed attempts were made by Versant to find another position that could accommodate your religious beliefs however, you did not follow-up on your request as required by the company. Evidence further revealed that you injured your arm while performing your job at A T & T, however there was no evidence uncovered to support that you were discriminated against because of your disabilities.

The District Director's determination in this matter is attached. The Director's determination concludes the processing of this charge. You have a right to file a lawsuit against the Respondent named in your charge in U. S. District Court within 90 days of the date on the determination notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Johnson", is written over a faint, circular official stamp.

Karen Johnson  
Enforcement Supervisor

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: **Dorothy A. Dunbar**  
**245 W. Person Ave.**  
**Memphis, TN 38109**

From: **Memphis District Office**  
**1407 Union Avenue**  
**Suite 901**  
**Memphis, TN 38104**



On behalf of person(s) aggrieved whose identity is  
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

490-2013-01483

**Brenda D. Johnson,**  
**Investigator**

(901) 544-0143

## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Enclosures(s)

*for*  
**Katharine W. Kores,**  
**Director**

9-26-14

(Date Mailed)

cc:

**W. Mackin Johnson**  
**Attorney**  
**Butler Snow**  
**P. O. Box 6010**  
**Ridgeland, MS 39158-6010**

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: **Dorothy A. Dunbar**  
**245 W. Person Ave.**  
**Memphis, TN 38109**

From: **Memphis District Office**  
**1407 Union Avenue**  
**Suite 901**  
**Memphis, TN 38104**



On behalf of person(s) aggrieved whose identity is  
**CONFIDENTIAL (29 CFR §1601.7(a))**

EEOC Charge No.

EEOC Representative

Telephone No.

**490-2013-02213**

**Brenda D. Johnson,**  
**Investigator**

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On behalf of the Commission

*for*   
**Katharine W. Kores,**  
**Director**

**9-26-14**

(Date Mailed)

Enclosures(s)

cc:

**Faye Savant**  
**Sr. Consultant EEO**  
**A T & T**  
**208 S. Akard Rm 2121**  
**Dallas, TX 75202**



**INFORMATION RELATED TO FILING SUIT  
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.  
If you also plan to sue claiming violations of State law, please be aware that time limits and other  
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),  
the Genetic Information Nondiscrimination Act (GINA), or the Age  
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

**PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):**

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10** -- not 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

**ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:**

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

**ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:**

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

**IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.**